

**THE ROSEN LAW FIRM, P.A.**

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Lead Counsel for Lead Plaintiffs

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

P. VAN HOVE BVBA, PASCAL VAN HOVE  
GCV, JOHN THOLLON, MICHAEL ZABINSKI,  
JEAN DOYLE, AND MARK LAROSA,  
INDIVIDUALLY AND ON BEHALF OF ALL  
OTHERS SIMILARLY SITUATED,

Plaintiffs,

vs.

UNIVERSAL TRAVEL GROUP, INC.,  
JIANGPING JIANG, YIZHAO ZHANG, JIANG  
XIE, JIDUAN YUAN, LAWRENCE LEE, LIZONG  
WANG, DAVID T. SVOBODA, AND  
ACQUAVELLA, CHIARELLI, SHUSTER & CO.,  
LLP, ACQUAVELLA, CHIARELLI, SHUSTER,  
BERKOWER & CO., LLP, JOSEPH P.  
ACQUAVELLA, SANTO CHIARELLI, SAMUEL  
SHUSTER, AND MAURICE BERKOWER,

Defendants.

CASE No.: 2:11-cv-2164 (JMV) (JBC)

**LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that, pursuant to the Court's Order Preliminarily Approving Proposed Settlement entered December 29, 2016 (Dkt. # 205), on June 6, 2017, at 10:00 a.m., or as soon thereafter as counsel may be heard, at the U.S. Courthouse, 402 East State Street, Room 5E, Trenton, New Jersey 08608, before the Honorable John Michael Vasquez, United States District Judge, Lead Plaintiffs, through their Counsel, will move for approval of the class action Settlement and the Plan of Allocation of Settlement proceeds. Lead Plaintiffs' motion is based on the Memorandum of Law in Support; the Declaration of Laurence M. Rosen in Support of Final Approval of Settlement, and the exhibits thereto; the Stipulation of Settlement filed July 1, 2016, and the exhibits thereto (Dkt. # 197-1); and all other pleadings and matters of record and such additional evidence or argument as may be presented at the hearing.

Dated: May 9, 2017

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 9, 2017.

Dated: May 9, 2017

/s/ Laurence Rosen